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DEPARTMENT OF COMMERCE AND CONSUMER AFFAIRS  
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March 9, 2001

Mr. Ben Henson, Executive Director  
Appraisal Subcommittee  
Federal Financial Institutions Examination Council  
2000 K. Street NW, Suite 310  
Washington, D.C. 20006

Dear Mr. Henson:

Recently, we received a request for the addresses of all appraisers licensed in Hawaii that prompts this correspondence regarding the disclosure of appraiser addresses on the National Registry.

May we first explain that Hawaii real estate appraisers are licensed as individuals, rather than their business entities. Therefore, we do not require applicants for real estate appraiser licensure or certification to provide a business address upon application. Our licensing records include appraisers mailing addresses. However, because many appraisers choose to work from home, their residence address is also their mailing address.

Although Hawaii Revised Statutes (HRS) §92F-19(a)(3) authorizes the Department to disclose government records to the ASC, HRS §92F-19(b) further states that "An agency receiving government records pursuant to subsection (a) shall be subject to the same restrictions on disclosure of the records as the originating agency."

Pursuant to the Office of Information Practices (OIP) Opinion Letter 90-10, disclosure of an individual licensee's home address would "constitute a clearly unwarranted invasion of personal privacy" under HRS §92F-13(1) and "an individual's privacy interest in such information is not outweighed by the public interest in disclosure". Thus the Department is precluded from disclosing the residential addresses licensed or certified real estate appraisers. Consequently, information transmitted to the ASC by our Department must be treated with the same consideration for confidentiality.


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Because of our concern with the disclosure of mailing addresses, which are also residence addresses, we ask the purpose for providing addresses of appraisers to the ASC and if it is necessary to post an address on the National Registry for each appraiser.

Thank you for your prompt attention to this matter.

Should you have any questions or comments regarding this matter, I can be reached at (808) 586-2704.

Sincerely,



Candace Ito  
Executive Officer

CI:slg

cc: Kathryn Gearheard, Senior Appraisal Policy Manager